



**Georgia Department of Education**  
**Office of the State Superintendent of Schools**  
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**State Superintendent of Schools**

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April 28, 2000

FD2000 Project Coordinator  
Food Distribution Division - FNS  
3101 Park Center Drive  
Ford Avenue Bldg. - Room 601  
Alexandria, Virginia 22302

Dear Project Coordinator:

As School Nutrition Program Manager for Georgia, I submit the following comments on the February 14, 2000, USDA Proposal for Change.

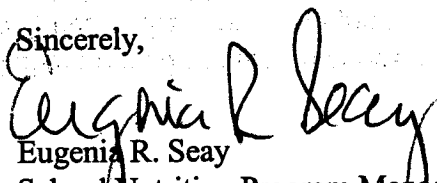
While there is not a great deal of detail about the 16 changes, it appears from reviewing what is contained in each that there are several which, if applied to the current program, would make significant improvement toward the items you identified as "problems" under Section I. School systems in Georgia have not identified these as being problems. However, USDA Proposal for Change numbers 1 (good concept but don't create storage problem at distributor level with implementation and don't make foods 100% substitutable), 2, 5 (depends on how implemented), 8 (great idea), 9, 10, 11, and the relaxing truckload restrictions part of number 15 do appear to be good changes.

The part that is very troubling is allowing vendors to 1) use commercial labels and 2) expand full substitutability of commodity product. Both accountability and the safety of our food supply would be greatly compromised for our recipient agencies and our students if these two concepts are implemented.

I cannot comment on the pilots, because there is too little information on USDA's website and in the proposal for change. I strongly feel that prior to beginning the pilots, baseline information/data, expected outcomes, and evaluation methods must be established and published.

I am also requesting that tabulated comment information be made available for access so I can see the nature of other comments submitted in response to the proposal for changes. Thank you.

Sincerely,

  
Eugenia R. Seay  
School Nutrition Program Manager